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Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00014-KJM
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE TO
vs.)	CONVERT HOME DETENTION TO CURFEW;
)	PROPOSED ORDER
BRYAN PAUL TAMBLYN,)	
)	Hon. Jeremy D. Peterson
Defendant.)	
)	
)	

At the request of Pretrial Services, the defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Tamblyn's pretrial release by removing Special Condition of Release Number Fifteen (15), "Home Detention" and replacing it with a new Special Condition of "Curfew" from 8:00 p.m. to 8:00 a.m.

The parties request the following language replace the existing Special Condition 15:

"CURFEW: You must remain inside your residence from 8:00 p.m. until 8:00 a.m. every day, except for employment, education, religious services, medical, substance abuse, or mental health treatment, attorney visits, court appearances, court ordered obligations, or other activities pre-approved by the pretrial services officer."

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1 Mr. Tamblyn has been on pretrial release in this district since February 2020, on a
2 \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and
3 co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26
4 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust).
5 Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr.,
6 Jerome Espinosa, and Sheri Placencia. Mr. Tamblyn has remained in compliance with all of his
7 conditions of release throughout his time on supervision.

8 The conversion of Mr. Tamblyn's location monitoring condition to curfew will permit
9 Mr. Tamblyn to regularly exercise outside of his home, spend more time with his family, and
10 develop healthy social habits, all of which are goals which have been repeatedly recommended
11 by Mr. Tamblyn's mental health counselor. The parties agree and recommend that all other
12 conditions remain in full force and effect. The proposed amended condition is attached to this
13 request. The parties do not request a hearing in this matter in light of this stipulation.

14
15 Respectfully submitted,
16 DATED: August 4, 2021 HEATHER E. WILLIAMS
17 Federal Defender
18 /s/ Megan T. Hopkins
19 MEGAN T. HOPKINS
20 Assistant Federal Defender
21 Attorney for BRYAN PAUL TAMBLYN

22 DATED: August 4, 2021 PHILLIP A. TALBERT
23 Acting United States Attorney
24 /s/ Christina McCall
25 CHRISTINA MCCALL
26 Assistant United States Attorney
27 Attorney for the United States
28

[PROPOSED] ORDER


GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT Special Condition of Release Number 15 for defendant, Bryan Paul Tamblyn, be Amended to replace the condition of Home Detention with a condition of Curfew, as follows:

CURFEW: You must remain inside your residence from 8:00 p.m. until 8:00 a.m. every day, except for employment, education, religious services, medical, substance abuse, or mental health treatment, attorney visits, court appearances, court ordered obligations, or other activities pre-approved by the pretrial services officer.

All other conditions of pretrial release shall remain in force.

The Amended Special Condition of Release is hereby adopted.

DATED: August 4, 2021


HON. JEREMY D. PETERSON
United States Magistrate Judge